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May 2, 2023

VIA ECF

Valerie Figueredo
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *International Code Council, Inc. v. UpCodes, Inc. et al. – Consolidated Case*
No. 1:17-cv-6261

Dear Magistrate Judge Figueredo:

The parties hereby jointly request that the Court enter the Stipulated Order Regarding Confidentiality of Discovery and Inadvertent Disclosure of Privileged Material (Dkt. 27) ("Stipulated Order") from the first copyright case (1:17-cv-06261-VM-VF), Dkt. 27, as the Stipulated Order in the consolidated second copyright case (1:22-cv-10815-VM-VF). Pursuant to Paragraph 11 of the Stipulated Protective Order, the parties have further stipulated and agree that discovery produced in the copyright case and false advertising case (1:20-cv-04316-VM-VF), including discovery material bearing a CONFIDENTIAL or HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY designation, may be used in the second copyright case and do not need to be reproduced in the second copyright case, subject to the Stipulated Order's provisions for the treatment of such confidential material.

Sincerely,

A handwritten signature in blue ink that reads 'J. Kevin Fee'.

J. Kevin Fee

CC: All counsel of record